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EXECUTIVE SECRETARY

March 21, 2000

Mr. David Waddell
Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243-0505

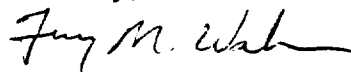
Re: IntraLATA Dialing Parity Implementation Plan
Docket No. 99-00295

Dear Mr. Waddell:

Enclosed is an original and thirteen (13) copies of replacement pages for the IntraLATA Toll Dialing Parity Implementation Plan.

If you have any questions, please let me know.

Sincerely,



Terry M. Wales
General Manager

TMW/cm

c: Mr. Dale Grimes

I. Purpose

Ardmore Telephone Company, Inc. (Ardmore) has described herein the process for implementing intraLATA toll dialing parity in the Ardmore exchanges located in the state of Tennessee. The intent of this Plan is to provide a proposal that, upon implementation, would provide customers the ability to select the participating telecommunications carrier of their choice for routing their intraLATA toll calls. Ardmore will associate with the 470 LATA for the purpose of toll dialing parity.

Ardmore Telephone Company, Inc. has been advised that under the rules and regulations of the Federal Communications Commission, it is considered a LEC, and the Federal Communications Commission ("FCC") has directed that no later than April 22, 1999, all LECs must file intraLATA toll dialing parity plans with the State Regulatory Commission (in Tennessee, the Tennessee Regulatory Authority) for each state in which the LEC provides telephone exchange service if a plan has not yet been filed with such state commission. Ardmore has not theretofore filed such a plan.

Concurrently with the filing of this plan, Ardmore is filing with the Tennessee Regulatory Authority (TRA) a petition for modification (petition) of the timeframes for implementation of toll dialing parity that was prescribed by the Federal Communications Commission (FCC) as well as the FCC's "default carrier rules". The May 1, 2000 date noted herein is based on the assumption that the TRA will approve Ardmore's petition for the reasons stated therein.

II. IntraLATA Environment

Ardmore customers in Tennessee in the Ardmore area can currently dial an access code to complete intraLATA toll calls to another carrier. After implementation of the intraLATA toll dialing plan, customers will be able to subscribe to the carrier of their choice for intraLATA as well as interLATA service (two-PIC subscription capability). Customers will dial 1+ the area code and number to complete calls using their subscribed carrier. If customers wish to complete a call using a carrier other than their subscribed carrier, they will need to dial the carrier's access code.

Each end office switch will be equipped with the capability of allowing each end user subscriber to select "no-PIC" as a valid intraLATA subscription selection. Customers selecting "no-PIC" as their subscribed carrier will not be able to make intraLATA toll calls on a 1+ or 0+ dialed basis. Such customer will need to dial an access code each time he or she makes an intraLATA call.

In 1992, toll-free intraLATA county-wide calling was initiated for all Local Exchange Carriers via an order from the Tennessee Public Service Commission. BellSouth currently maintains tax-code billing tables to identify "free-county-wide" intraLATA toll calls originated by Ardmore intraLATA toll customers and to ensure that billing does not occur on these calls. Ardmore will continue to process toll-free intraLATA county-wide calls in this manner for toll customers after implementation of intraLATA toll dialing.

III. Implementation Schedule

The Company will implement toll dialing parity, subject to TRA's approval of this IntraLATA Toll Dialing Plan, as outlined below:

TENNESSEE
METHODOLOGY FOR RECOVERY OF COSTS
ASSOCIATED WITH
IMPLEMENTATION OF INTRALATA SUBSCRIPTION
CALCULATION OF INITIAL EQUAL ACCESS RATE ELEMENT

Step 1: Identify the estimated total incremental costs directly attributable to the provisioning of IntraLATA Subscription. Incremental costs include the following items:

- a) network hardware upgrades to provide the full 2-PIC methodology in all exchanges
- b) central office software upgrades
- c) software translations
- d) system programming/testing
- e) training for Business Office, Marketing, Carrier Services, Customer Services, and Service Center personnel
- f) customer notification (bill message, newsletter and special mailing)
- g) implementation activity – administrative costs
- h) PIC change charge waiver

\$75,000

Step 2: Identify estimated total Intrastate/IntraLATA minutes of use for the 4 year recovery period.

9,504,000

Step 3: Calculate a cost recovery rate by dividing amount in Step 1 by the Minutes of Use in Step 2.

\$0.007891

ANNUAL TRUE-UP OF EQUAL ACCESS RATE ELEMENT

Repeat Steps 1 through 3 and calculate an updated access rate element by dividing amount in Step 1, adjusted by the previous year/years cost recovery.